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Attorneys for Plaintiff, SCANNING TECHNOLOGIES INNOVATIONS LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

SCANNING TECHNOLOGIES INNOVATIONS LLC,	§ § §	
Plaintiff,	§ §	Case No:
vs.	§ §	PATENT CASE
FISHBOWL SOLUTIONS, LLC,	§ §	
Defendant.	§ § §	

ORIGINAL COMPLAINT

Pursuant to F.R.C.P. 15(a)(1)(B), Plaintiff Scanning Technologies Innovations, LLC

("Plaintiff" or "STI") files this Original Complaint against Fishbowl Solutions, LLC

("Defendant" or "Fishbowl") for infringement of United States Patent No. 10,600,101

(hereinafter "the '101 Patent").

<div align="center">**PARTIES AND JURISDICTION**</div>

1.   This is an action for patent infringement under Title 35 of the United States Code. Plaintiff is seeking injunctive relief as well as damages.

2.   Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising under the United States patent statutes.

3.   Plaintiff is a Texas limited liability company having an address of 1801 NE 123 St., Suite 314, Miami, FL 33181.

4.   On information and belief, Defendant is a Utah limited liability company having a place of business at 580 Technology Way, Bldg. C, Ste. 2500, Orem, UT 84097. On information and belief, Defendant may be served through its agent, Dusty Miller, at the same address.

5.   On information and belief, this Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in this District, has conducted business in this District, and/or has engaged in continuous and systematic activities in this District.

6.   On information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in this District.

<div align="center">**VENUE**</div>

7.   Venue is proper in this District 28 U.S.C. §1400(b) because Defendant is deemed to reside in this District. Alternatively, acts of infringement are occurring in this District and Defendant has a regular and established place of business in this District.

COUNT I
(INFRINGEMENT OF UNITED STATES PATENT NO. 10,600,101)

8.   Plaintiff incorporates paragraphs 1 through 7 herein by reference.

9.   This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, *et seq.*

10.   Plaintiff is the owner by assignment of the '101 Patent with sole rights to enforce the '101 Patent and sue infringers.
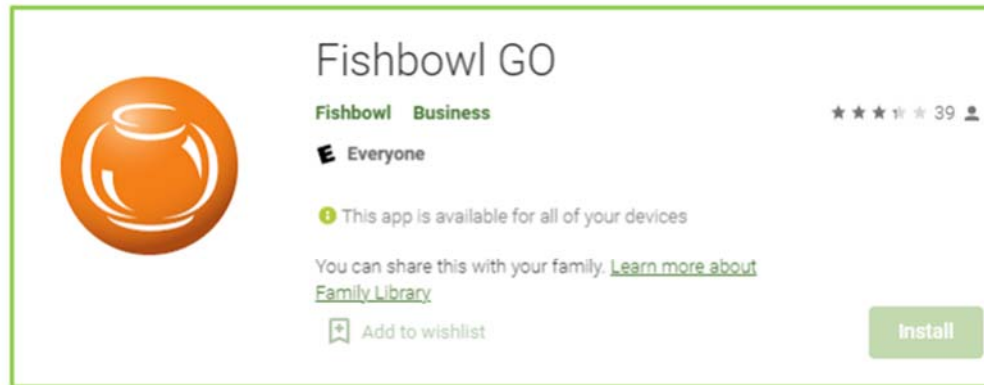
11.   A copy of the '101 Patent, titled "Systems and Methods for Indicating the Existence of Accessible Information Pertaining to Articles of Commerce," is attached hereto as Exhibit A.

12.   The '101 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

13.   Upon information and belief, Defendant has infringed and continues to infringe one or more claims, including at least Claim 1, of the '101 Patent by making, using, importing, selling, and/or offering for sale an inventory management system covered by one or more claims of the '101 Patent. Defendant has infringed and continues to infringe the '101 Patent directly in violation of 35 U.S.C. § 271.

14.   Defendant sells, offers to sell, and/or uses an inventory system including, without limitation, the Fishbowl Inventory system, any associated hardware and software, and any similar products (collectively, "Product"), which infringe at least Claim 1 of the '101 Patent.

15.   The Product provides an application for scanning barcodes to obtain a decoded link, which contains information about an article of commerce. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

Source: https://play.google.com/store/apps/details?id=com.fbi.mobile&hl=en&gl=US

FISHBOWL INTEGRATES WITH ANDROID®

Fishbowl offers a rugged warehouse management app that works on any device with the Android operating system. Use handheld barcode scanners and other mobile devices with the Android 4.4. KitKat (or newer) version to scan barcodes, cycle count, and much more!

Source: https://www.fishbowlinventory.com/android-inventory-app
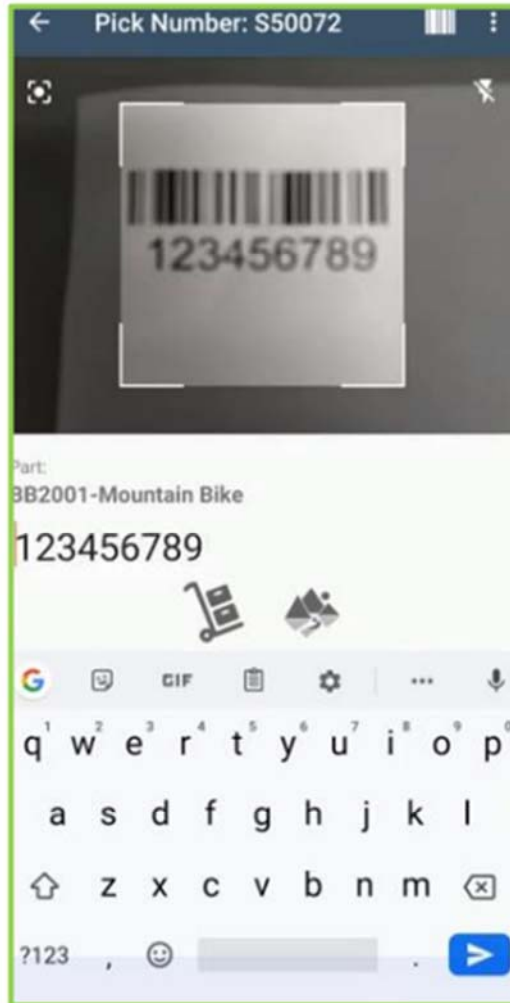

BENEFITS OF FISHBOWL'S INTEGRATION WITH ANDROID

Easy Installation: Fishbowl's app is called Fishbowl Go™, and it's easy to install and run on any Android device.

Scan Barcodes: Fishbowl Go lets you scan products in and out of your inventory. This eliminates the worry of manually typing in the wrong SKUs or other data.

Pick, Pack, Ship, and More: Use Android devices to pick, pack, and ship orders, as well as receive new inventory, update work orders, cycle count inventory, and retrieve part information.
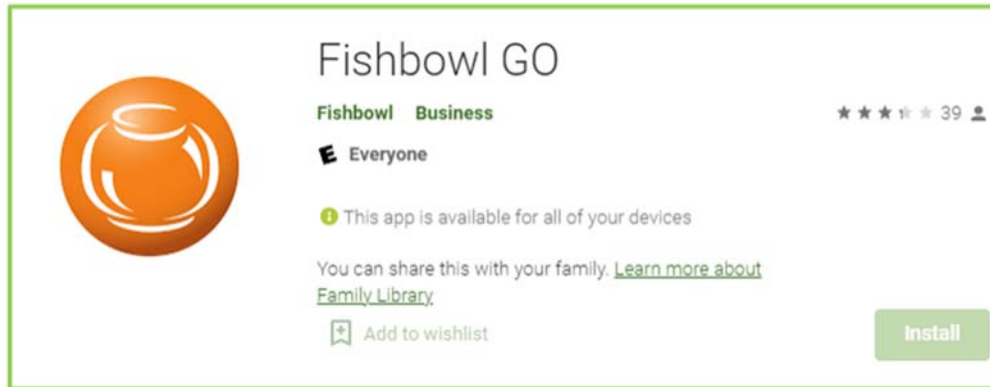
Use Your Own Devices: Fishbowl's integration with Android means you don't have to buy specialized hardware. You can use the Android devices you currently own to efficiently manage your warehouse.

Source: https://www.fishbowlinventory.com/android-inventory-app

Source: https://www.fishbowlinventory.com/products/fishbowl-go

16. The Product includes a mobile device comprising a portable handheld housing and a communication interface configured to enable the mobile device to communicate with a communication network. For example, the Product incorporates a handheld device (e.g., mobile device with Product software) and a communication interface (i.e. cloud based communication interface) configured to enable the handheld device to communicate with a communication network (e.g., cloud network). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.
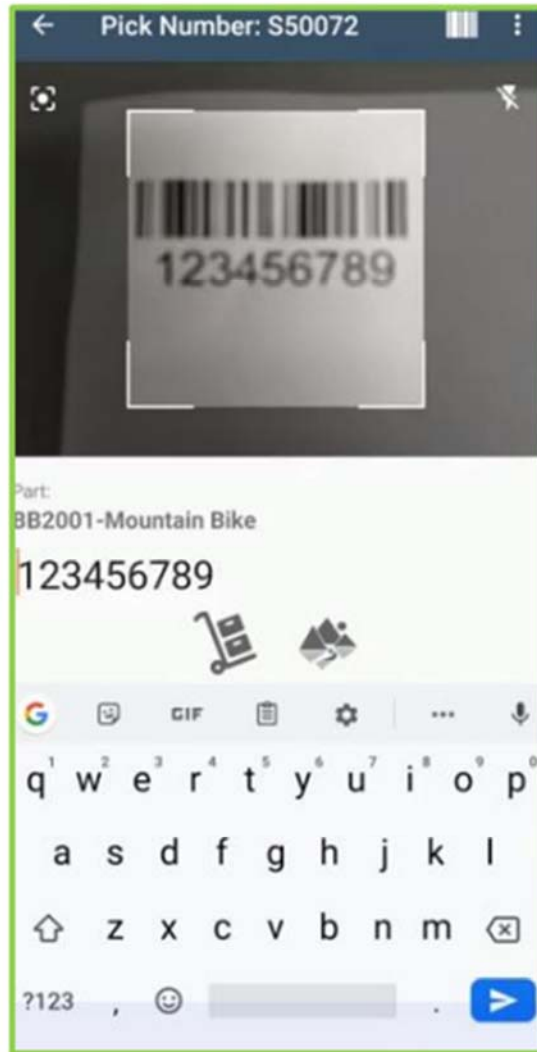
Source: https://play.google.com/store/apps/details?id=com.fbi.mobile&hl=en&gl=US

INVENTORY MANAGEMENT IN THE CLOUD

When considering cloud-based inventory management software options, make sure they have the features your team will need to properly manage your warehouse. Here's a list of some important features to consider when researching inventory management software:

- Accounting system integration
- Barcode tracking
- Multi-location part tracking
- Order management

Source: https://www.fishbowlinventory.com/cloud-based-inventory-management

Source: https://www.fishbowlinventory.com/products/fishbowl-go

17.   The Product uses a signal processing device and a visual input device, the visual input device affixed within the portable handheld housing. For example, a visual input device (e.g., camera for scanning barcode) and signal processing device (i.e. processor of handheld device) are affixed within the portable handheld housing (e.g., the housing of the mobile device). The mobile device camera is used to scan a barcode and, via the Product's server, obtain details related to a particular product. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.
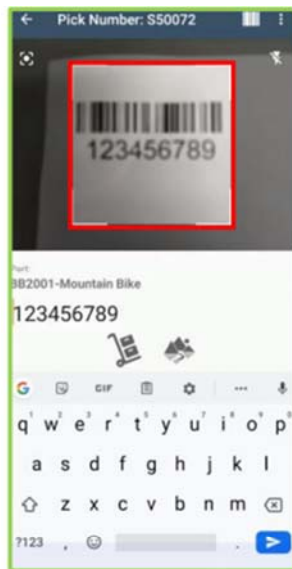
Source: https://www.fishbowlinventory.com/android-inventory-app

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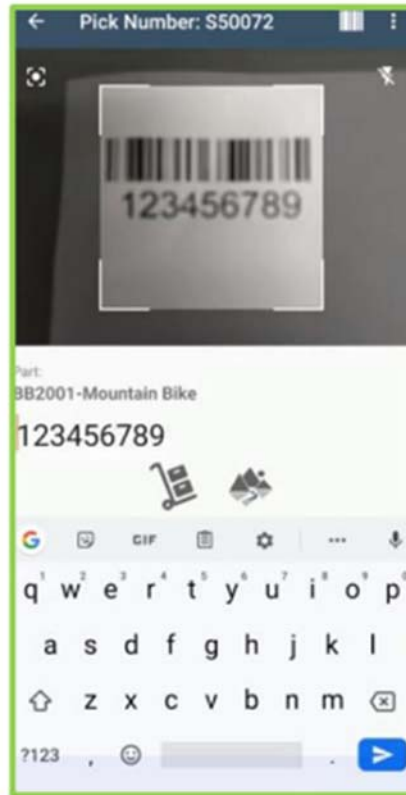
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Use Your Own Devices: Fishbowl's integration with Android means you don't have to buy specialized hardware. You can use the Android devices you currently own to efficiently manage your warehouse.

Source: https://www.fishbowlinventory.com/products/fishbowl-go
Source: https://www.fishbowlinventory.com/android-inventory-app

18.   The Product comprises digital files associated with the mobile device. For example, the Product application has digital files (e.g., barcode image files and digital product information) associated with the mobile device. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

Source: https://www.fishbowlinventory.com/products/fishbowl-go

19.   The Product also includes a server in communication with the communication network, the server comprising a server database configured to store a look-up table that includes at least a plurality of bar codes associated with a plurality of articles of commerce. For example, the Product app communicates with a server through a cloud communication network, the server comprising look-up table (i.e. remote database). Also, the server database contains barcodes, each having associated information about a particular article of commerce. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

INVENTORY DATABASE
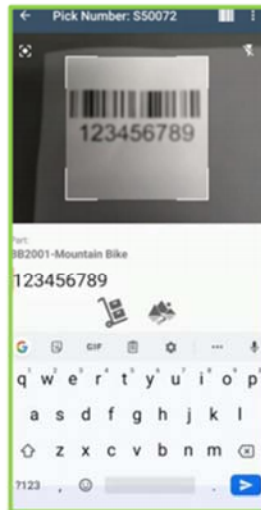
WHAT FEATURES DO YOU NEED FROM AN INVENTORY DATABASE?

The term "inventory database" may feel a bit legacy with all the technology available to wholesalers and manufacturers, but it is still at the core of an inventory management system.

- **Easy to use** – Using new programs or systems can be intimidating, the simpler the better. A complex system does not equate to a powerful system. You want a robust solution that's easy to use and manage.

- **Accuracy** – Your database needs to accurately reflect your inventory on the shelf and it needs to update in real time with your product inflow and outflow.

- **Storage** – This may seem obvious, but you can run out of data storage quickly. We're not just talking gigabytes of space; you may need terabytes of space available. Performing data backups via an external hard drive or cloud-based service have become a necessity. Technology malfunctions occur all the time and losing your data would be devastating.

- **Reporting** – It's important to view your data in a way that allows you to make decisions. Reorder points, price changes, keeping up with demand, seasonality, etc. To stay lean and fluid, you need to know how much inventory is available at any given time.
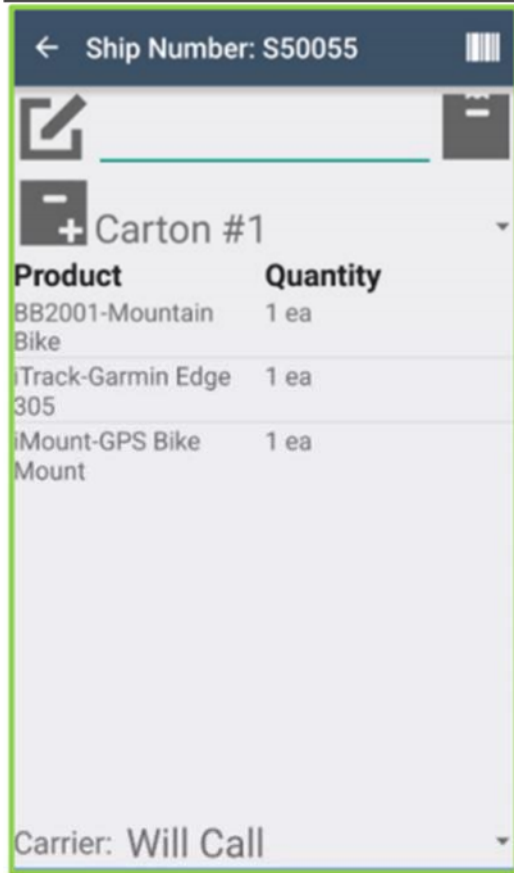
Source: https://www.fishbowlinventory.com/inventory-database

An inventory system like Fishbowl can help you track inventory in real time via barcode scanning and let you see a high-level overview of all inventory in stock and in transit. You can instantly search for and retrieve any SKU. You can track your products across multiple warehouses and locations from a single computer or cell phone if you chose to use the **Fishbowl Anywhere** plugin. The ability to integrate with QuickBooks is the real game changer. Keeping your finances and inventory data in sync is invaluable and will spare your accountant the headache of double data entry and coordinating all of the data across multiple platforms.

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Source: https://www.fishbowlinventory.com/products/fishbowl-go

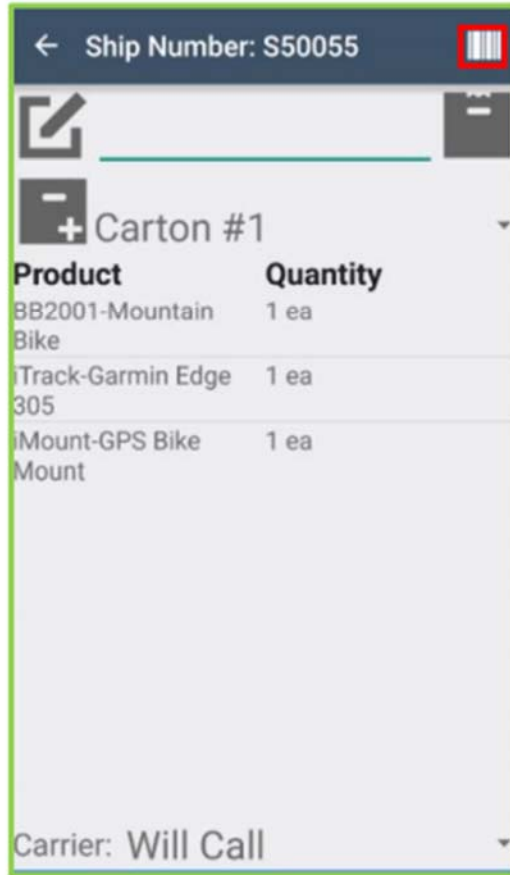Source: https://play.google.com/store/apps/details?id=com.fbi.mobile&hl=en&gl=US

20.   The look-up table also stores a plurality of information link indicators, each information link indicator associated with a respective bar code and article of commerce. For example, the look-up table (i.e. remote cloud database accessed by the Product app/software) also stores a plurality of information link indicators (e.g., link indicating scanned product and/or validation of scanned barcode details associated with the product) indicating information associated with a respective barcode. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.
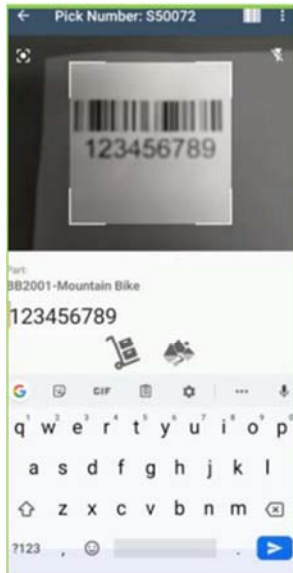
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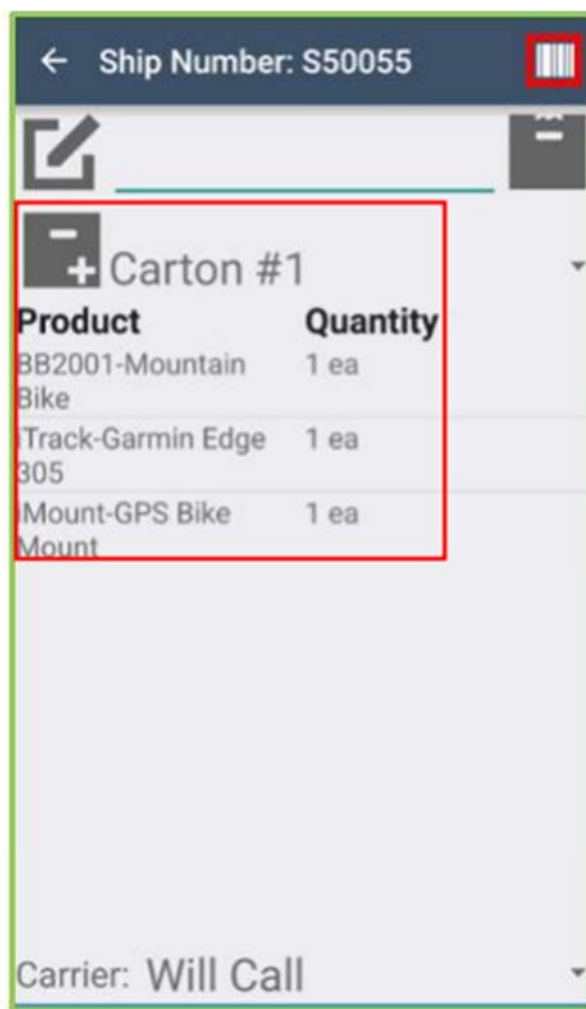
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Source: https://www.fishbowlinventory.com/products/fishbowl-go
Source: https://www.fishbowlinventory.com/android-inventory-app

21.   Each information link indicator is configured as a status signal indicating the existence or absence of a link to information pertaining to a respective article of commerce, the link being made to the information via the communication network.   For example, each information link which is obtained by scanning a code indicates a status signal (e.g., link indicating validation of scanned code product and details associated with product). The information associated with the link is retrieved through the cloud communication network. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

Source: https://play.google.com/store/apps/details?id=com.fbi.mobile&hl=en&gl=US

Source: https://www.fishbowlinventory.com/products/fishbowl-go
Source: https://www.fishbowlinventory.com/android-inventory-app

Source: https://www.fishbowlinventory.com/cloud-based-inventory-management

22.   The visual input device is configured to scan an image of an article of commerce,

decode the image to obtain a bar code and forward data from the scanned image to the signal

processing device. For example, the visual input device (i.e. handheld device camera) is

configured to scan an image of a barcode associated with an article of commerce. After scanning

the code, the code is decoded using Product software, which may be located on the mobile

device, to retrieve information about the product. The information is forwarded to the signal

processing device (i.e. processor of mobile device). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

23.   In response to receiving the bar code, the signal processing device (i.e. mobile device) is configured to look up the code in the look-up table (i.e. remote database) to determine from a respective information link (e.g., link indicating validation of scanned barcode product) whether or not information pertaining to an article of commerce associated with the code (information about the associated product) may be accessed via the communication network. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

24.   Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

25.   Defendant's actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

26.   Plaintiff is in compliance with 35 U.S.C. § 287.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff asks the Court to:

(a)   Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;

(b)   Enter an Order enjoining Defendant, its agents, officers, servants, employees, attorneys, and all persons in active concert or participation with Defendant who receive notice of the order from further infringement of United States Patent No. 10,600,101 (or, in the alternative, awarding Plaintiff a running royalty from the time of judgment going forward);

(c)   Award Plaintiff damages resulting from Defendant's infringement in accordance with 35 U.S.C. § 284;

(d)   Award Plaintiff pre-judgment and post-judgment interest and costs; and

(e)   Award Plaintiff such further relief to which the Court finds Plaintiff entitled under law or equity.

Dated: June 3, 2021   Respectfully submitted,

/s/ Geoffrey E. Dobbin
Geoffrey E. Dobbin
Geoff@DobbinIPLaw.com
UT Bar #9371
DOBBIN IP LAW, P.C.
Attorney for Defendant
2250 S Redwood Road, Suite 5
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